

## CLARIFICATION OF WAC 314-55-102, SECTION C, III: E. COLI (PATHOGENIC STRAINS)

The CSTF Microbial Work Group needs clarification on WAC 314-55-102 Section C, III: Microbiological Screening.

**Details:** The section reads:

*The sample and related lot or batch fail quality assurance testing for microbiological screening if the results exceed the following limits:*

	<b>Enterobacteria (bile-tolerant gram-negative bacteria)</b>	<b><i>E. coli</i> (pathogenic strains) and <i>Salmonella spp.</i></b>
<b>Unprocessed Plant Material</b>	10 <sup>4</sup>	Not detected in 1g
<b>Extracted or processed Botanical Product</b>	10 <sup>3</sup>	Not detected in 1g

*E. coli* (pathogenic strains) is too broad for the scope of the Microbial Work Group. Pathogenic *E. coli* can be divided into 6 different pathotypes which are associated with diarrhea. The six pathotypes are: 1. Shiga-toxin producing *E. coli* (STEC) (also could be referred to as VTEC or EHEC), 2. Enterotoxigenic *E. coli* (ETEC), 3. Enteropathogenic *E. coli* (EPEC), 4. Enteroaggregative *E. coli* (EAEC), 5. Enteroinvasive *E. coli* (EIEC), and 6. Diffusely adherent *E. coli* (DAEC).

**Reasoning (for clarification):** Pathogenic *E. coli* can refer to any (or all) of the pathotypes. While testing can be performed to detect the pathotypes, the WA Department of Health and the WA Department of Agriculture test strictly for the presence of STEC in clinical and environmental samples. The Work Group requests guidance/clarification on this matter prior to researching methodology to detect the presence/absence of pathogenic *E. coli*.

**Resources:** cdc.gov